

EXHIBIT A
DISPOSITIVE MOTIONS SUBJECT TO REMAND

Plaintiff(s)	Case Caption(s)	Transferor Jurisdiction	Relevant Dispositive Motions	Subject To Relevant “Differing Circuit Law”?	
				Defendants’ Position ¹	Plaintiffs’ Position
Costco	<i>Costco Wholesale Corp. v. Hitachi, Ltd, et al.</i> , Case No. 11-cv-06397 <i>Costco Wholesale Corporation v. Technicolor SA, et al.</i> , No. 13-cv-05723	W.D. Wash. (9th Cir.)	ECF 3006 (Motion for Partial Summary Judgment on Plaintiffs’ Indirect Purchaser Claims Based on Foreign Sales)	No ²	No
			ECF 3008 (Motion for Summary Judgment Based Upon Plaintiffs’ Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA)	No	
			ECF 3032 (Motion for Partial Summary Judgment on FTAIA Grounds)	No	
CompuCom	<i>CompuCom Systems, Inc. v. Hitachi, Ltd., et al.</i> , No. 2:11-cv-06396	N.D. Tex. (5th Cir.)	ECF 3008 (Motion for Summary Judgment Based Upon Plaintiffs’ Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA)	No	No
			ECF 3032 (Motion for Partial Summary Judgment on FTAIA Grounds)	No	

¹ As noted in the Court’s Order, the parties have not had sufficient time to fully research the governing FTAIA and other applicable law in all relevant transferor jurisdictions, including, among other things, how those courts have interpreted and applied governing FTAIA standards. See Order at 2. Accordingly, Defendants respectfully reserve the right to seek remand of any of the cases subject to remand upon completion of pretrial matters under 28 U.S.C. § 1407 and *Lexecon, Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998), once Defendants have had an opportunity to conduct a more detailed analysis of the governing FTAIA and other applicable law in all relevant jurisdictions.

² Defendants acknowledge that there are certain legal issues in connection with the FTAIA that have divided appellate courts, but Defendants respectfully submit that none of those issues is directly relevant to the resolution of any of Defendants’ pending FTAIA dispositive motions because those motions are meritorious under the law in any jurisdiction.

Plaintiff(s)	Case Caption(s)	Transferor Jurisdiction	Relevant Dispositive Motions	Subject To Relevant “Differing Circuit Law”?	
				Defendants’ Position ¹	Plaintiffs’ Position
			ECF 2983 (Motion for Partial Summary Judgment for Lack of Standing as to Direct Action Plaintiffs' Sherman Act Damage Claims Based on CRT Product Purchases from Samsung Electronics)	Yes	
			ECF 3053 (Corrected motion for partial summary judgment on standing grounds based on purchases from LPD)	Yes	
Dell	<i>Dell Inc., et al. v. Phillips Electronics North America Corporation, et al.</i> , No. 13-cv-02171	W.D. Tex. (5th Cir.)	ECF 3003 (Defendants’ Joint Notice of Motion and Motion for Summary Judgment Based Upon Plaintiffs’ Foreign Transactions Barred by the FTAIA)	No	No
			ECF 3008 (Motion for Summary Judgment Based Upon Plaintiffs’ Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA)	No	
			ECF 3032 (Motion for Partial Summary Judgment on FTAIA Grounds)	No	
			ECF 2983 (Motion for Partial Summary Judgment for Lack of Standing as to Direct Action Plaintiffs' Sherman Act Damage Claims Based on CRT Product Purchases from Samsung Electronics)	Yes	

Plaintiff(s)	Case Caption(s)	Transferor Jurisdiction	Relevant Dispositive Motions	Subject To Relevant “Differing Circuit Law”?	
				Defendants’ Position ¹	Plaintiffs’ Position
Electrograph P.C. Richard, <i>et al.</i> Tweeter	<i>Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al.</i> , No. 3:11-cv-01656	E.D.N.Y. (2d Cir.)	ECF 3008 (Motion for Summary Judgment Based Upon Plaintiffs’ Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA)	No	No
	<i>Electrograph Systems, Inc., et al. v. Technicolor SA, et al.</i> , No. 13-cv-05724		ECF 3032 (Motion for Partial Summary Judgment on FTAIA Grounds)	No	
	<i>P.C. Richard & Son Long Island Corp., et al., v. Hitachi, Ltd., et al.</i> , No. 3:12-cv-02648		ECF 2983 (Motion for Partial Summary Judgment for Lack of Standing as to Direct Action Plaintiffs’ Sherman Act Damage Claims Based on CRT Product Purchases from Samsung Electronics)	Yes	
	<i>P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al.</i> , No. 13-cv-0572		ECF 3053 (Corrected motion for partial summary judgment on standing grounds based on purchases from LPD)	Yes	

Plaintiff(s)	Case Caption(s)	Transferor Jurisdiction	Relevant Dispositive Motions	Subject To Relevant “Differing Circuit Law”?	
				Defendants’ Position ¹	Plaintiffs’ Position
	<i>Schultze Agency Services, LLC v. Hitachi, Ltd., et al.</i> , No. 3:12-cv-2649 <i>Schultze Agency Services, LLC v. Technicolor SA, Ltd., et al.</i> , No. 13-cv-05668		ECF 3026 (Motion for partial summary judgment as to Direct Action Purchaser’s Sherman Act damages claims based on CRT product purchases from NEC-Corporation and NEC-Mitsubishi Electric Visual Systems Corporation)	Yes	
Interbond	<i>Interbond Corp. of Am. v. Hitachi, Ltd. et al.</i> , No. 3:11-cv-06275 <i>Interbond Corp. of Am. v. Technicolor SA, et al.</i> , No. 13-cv-05727	S.D. Fla. (11th Cir.)	ECF 3006 (Motion for Partial Summary Judgment on Plaintiffs’ Indirect Purchaser Claims Based on Foreign Sales)	No	No
			ECF 3008 (Motion for Summary Judgment Based Upon Plaintiffs’ Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA)	No	
			ECF 3032 (Motion for Partial Summary Judgment on FTAIA Grounds)	No	
			ECF 2983 (Motion for Partial Summary Judgment for Lack of Standing as to Direct Action Plaintiffs’ Sherman Act Damage Claims Based on CRT Product Purchases from Samsung Electronics)	Yes	
			ECF 3014 (Motion for Partial Summary Judgment with Respect to DAPs’ Alleged Direct Damage	Yes	

Plaintiff(s)	Case Caption(s)	Transferor Jurisdiction	Relevant Dispositive Motions	Subject To Relevant “Differing Circuit Law”?	
				Defendants’ Position ¹	Plaintiffs’ Position
			Claims Based on Purchases from Sanyo)		
			ECF 3026 (Motion for partial summary judgment as to Direct Action Purchaser’s Sherman Act damages claims based on CRT product purchases from NEC-Corporation and NEC-Mitsubishi Electric Visual Systems Corporation)	Yes	
			ECF 3053 (Corrected motion for partial summary judgment on standing grounds based on purchases from LPD)	Yes	
Office Depot	<i>Office Depot, Inc. v. Hitachi, Ltd. et al.</i> , No. 3:11-cv-06276 <i>Office Depot, Inc. v. Technicolor SA, et al.</i> , No. 13-cv-05726	S.D. Fla. (11th Cir.)	ECF 3006 (Motion for Partial Summary Judgment on Plaintiffs’ Indirect Purchaser Claims Based on Foreign Sales)	No	No
			ECF 3008 (Motion for Summary Judgment Based Upon Plaintiffs’ Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA)	No	
			ECF 3032 (Motion for Partial Summary Judgment on FTAIA Grounds)	No	
			ECF 2983 (Motion for Partial Summary Judgment for Lack of Standing as to Direct Action Plaintiffs’ Sherman Act Damage Claims Based on CRT Product Purchases from Samsung Electronics)	Yes	
			ECF 3053 (Corrected motion for partial summary judgment on standing grounds based on purchases from LPD)	Yes	

Plaintiff(s)	Case Caption(s)	Transferor Jurisdiction	Relevant Dispositive Motions	Subject To Relevant “Differing Circuit Law”?	
				Defendants’ Position ¹	Plaintiffs’ Position
			ECF 3026 (Motion for partial summary judgment as to Direct Action Purchaser’s Sherman Act damages claims based on CRT product purchases from NEC-Corporation and NEC-Mitsubishi Electric Visual Systems Corporation)	Yes	
Tech Data	<i>Tech Data Corp., et al. v. Hitachi, Ltd., et al.</i> , No. 13-cv-00157	M.D. Fla. (11th Cir.)	ECF 3008 (Motion for Summary Judgment Based Upon Plaintiffs’ Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA)	No	No
			ECF 3032 (Motion for Partial Summary Judgment on FTAIA Grounds)	No	
			ECF 2983 (Motion for Partial Summary Judgment for Lack of Standing as to Direct Action Plaintiffs’ Sherman Act Damage Claims Based on CRT Product Purchases from Samsung Electronics)	Yes	
			ECF 3053 (Corrected motion for partial summary judgment on standing grounds based on purchases from LPD)	Yes	
			ECF 3026 (Motion for partial summary judgment as to Direct Action Purchaser’s Sherman Act damages claims based on CRT product purchases from NEC-Corporation and NEC-Mitsubishi Electric Visual Systems Corporation)	Yes	